JOHN ASHCROFT Governor DEC 1 2 1988



STATE OF MISSOURI

FREDERICK A. BRUNNER
Director

## DEPARTMENT OF NATURAL RESOURCES

### DIVISION OF ENVIRONMENTAL QUALITY

Springfield Regional Office 1155 East Cherokee Street Springfield, MO 65807 417-883-4033

Hazardous Waste/ General Greene County

December 7, 1988

Mrs. Otis Record Rt. 3 Springfield, MO 65804

Dear Mrs. Record:

This in response to your call regarding the Wilbert Vault Company in the Calloway area of Springfield, Missouri. The call was received in this office on November 8, 1988, and was concerning the possible ongoing dumping of toxic and/or hazardous waste as related to you by a neighbor, Mr. Don Cummings.

Please find enclosed the copy of the Report on Complaint Investigation. The report, I believe, is self explanatory. You will note that no violations of the hazardous waste regulations were observed during the investigation. If you or Mr. Cummings continue to feel that there are problems with the manner in which waste materials are handled at the facility and can provide us with more specific information such as where on the site materials is being disposed of and when, we would be glad to conduct further investigations into the matter.

I will speak to the personnel in our office who regulate the solid waste and have them determine whether or not the disposal of the concrete at the site is proper.

If you have any questions or further information for us, please fell free to contact me.

Sincerely.

SPRINGFIELD REGIONAL OFFICE

Charles L. Kroeger

Environmental Specialist

Enclosure

cc: Springfield Sanitary Services

2850 BARTON

Division of Energy

Division of Environmental Quality

Division of Geology and Land Survey Division of Management Services

Division of Parks, Recreation,

and Historic Preservation

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DEC 13 1900

### REPORT ON COMPLAINT INVESTIGATION

On November 8, 1988, this office received a call regarding the possible improper handling and disposal of hazardous wastes at the Wilbert Burial Vault Company in the Galloway area of Springfield. The complainant, Mrs. Otis Record, indicated that she had been advised by a neighbor that the company was dumping flammable and toxic wastes on the ground.

On November 17, 1988, I stopped by the company to speak with the owners and conduct an inspection of the operations at the site. Both the President and the Vice-President were out so I left a card and requested that they call me.

Mr. Bill Luckfield called me later that day to discuss the matter with He indicated that they did not have any hazardous wastes which they needed to dispose of. They use forming oil, a bronzing material, and an epoxy at the site. The rollers are disposed of after applying the material and there is none of the material disposed of. Any left over is returned to the container. He invited me to make an inspection of the operation anytime I wished.

I also spoke with Mr. Don Cummings, the neighbor who had advised the Records of the possible problems at the vault company. He indicated that there were numerous drums at the facility marked extremely hazardous - do not reuse and that some of the drums had material in them - up to half full. He had apparently been refused a barrel by the company when he requested one.

During the on-site investigation of December 6, 1988, I spoke with Rick Luckfield and later with his dad, Bill Luckfield. Rick Luckfield gave me a tour of the plant and answered questions regarding the different products used at the facility and the disposal, cleanup, and storage of materials.

Five materials appear to be used at the facility in the manufacturing of the burial vaults. These included forming oil, an epoxy, a bronzing material, a asphalt material, solvent parts cleaner, and solvent for cleaning the spray gun cannister.

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The forming oil, asphalt material, epoxy, and bronzing material are received in drums and mixed or used as required. Any of the material that is not used during a specific application is returned to the drum or placed in a container to be used later. The cost of the materials makes disposal impractical. The parts cleaner is in a cleaning basin in the shop and is disposed of with the waste oil about once per year. The solvent used to clean the paint gun cannister is placed in a five gallon can into which the cannister is placed overnight. I was advised that none of this material is disposed of as there is considerable evaporation from the container and more solvent is added as needed.

I also walked over the site and observed several empty drums stacked about 100 feet east of the shop. These drums were labeled asphalt and epoxy parts 1 and 2. Mr. Luckfield indicated that these drums were to be disposed. I observed only one flammable sticker and it was on an empty drum. There were several other drums in the yard area but these contained good product and not hazardous wastes. I saw no indication that hazardous wastes were being improperly stored or disposed of on the site.

Charles Legen